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United Healthcare Insurance Company,
United Health Care Services, Inc. dba Unitedhealthcare,
UMR, Inc. dba United Medical Resources,
Oxford Health Plans, Inc.,
Sierra Health and Life Insurance Company, Inc.,
Sierra Health-Care Options, Inc., and
Health Plan of Nevada, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FREMONT EMERGENCY SERVICES
(MANDAVIA), LTD., a Nevada professional
corporation; TEAM PHYSICIANS OF NEVADA-
MANDAVIA, P.C., a Nevada professional
corporation; CRUM, STEFANKO AND JONES,
LTD. dba RUBY CREST EMERGENCY
MEDICINE, a Nevada professional corporation

Plaintiff,

vs.

UNITEDHEALTH GROUP, INC., a Delaware
corporation; UNITED HEALTHCARE
INSURANCE COMPANY, a Connecticut
corporation; UNITED HEALTH CARE
SERVICES INC. dba UNITEDHEALTHCARE, a
Minnesota corporation; UMR, INC. dba UNITED
MEDICAL RESOURCES, a Delaware
corporation; OXFORD HEALTH PLANS, INC., a
Delaware corporation; SIERRA HEALTH AND
LIFE INSURANCE COMPANY, INC., a Nevada
corporation; SIERRA HEALTH-CARE

Case No.: 2:19-cv-00832-JAD-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE MOTION
TO DISMISS**

(FIRST REQUEST)

1 OPTIONS, INC., a Nevada corporation; HEALTH
2 PLAN OF NEVADA, INC., a Nevada corporation;
3 DOES 1-10; ROE ENTITIES 11-20,

Defendants.

4 Pursuant to Local Rules IA 6-1 and 7-3, Defendants Unitedhealth Group, Inc., United
5 Healthcare Insurance Company, United Health Care Services, Inc. dba Unitedhealthcare, UMR,
6 Inc. dba United Medical Resources, Oxford Health Plans, Inc., Sierra Health and Life Insurance
7 Company, Inc., Sierra Health-Care Options, Inc., and Health Plan of Nevada, Inc. (collectively
8 “Defendants”) and Plaintiffs Fremont Emergency Services; Team Physicians Of Nevada-
9 Mandavia, P.C.; Crum, Stefanko and Jones, Ltd. dba Ruby Crest Emergency Medicine
10 (collectively, the “Health Care Providers”), through their undersigned counsel, hereby stipulate
11 and request that this Court extend the deadline for Defendants to file their Motion to Dismiss the
12 Health Care Providers’ First Amended Complaint by fourteen (14) days, up to and including
13 February 4, 2020. Defendants, including new Defendant UnitedHealth Group, Inc., stipulate and
14 agree that they will file their Motion to Dismiss on February 4, 2020, and will not move to stay
15 the deadline to file a renewed Motion to Dismiss in connection with Defendants’ anticipated
16 objection to the Court’s order granting the Health Care Providers’ Motion for Leave to File a
17 First Amended Complaint.

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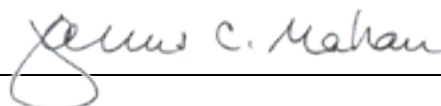


WHEREFORE, the parties respectfully request that this Court extend the deadline for Defendants to file their Motion to Dismiss the Health Care Providers' First Amended Complaint by fourteen (14) days, up to and including February 4, 2020.

IT IS SO STIPULATED.

Dated: <u>January 17, 2020</u>	Dated: <u>January 17, 2020</u>
MCDONALD CARANO LLP	WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC
<u>/s/ Kristen T. Gallagher</u> Pat Lundvall, Esq. Kristen T. Gallagher, Esq. Amanda M. Perach, Esq. 2300 W. Sahara Ave., Suite 1200 Las Vegas, Nevada 89102 <i>Attorneys for Plaintiffs</i> <i>Fremont Emergency Services (Mandavia), Ltd.;</i> <i>Team Physicians of Nevada-Mandavia, P.C.;</i> <i>Crum, Stefanko and Jones, Ltd. dba Ruby Crest</i> <i>Emergency Medicine</i>	<u>/s/ Colby L. Balkenbush</u> D. Lee Roberts, Jr., Esq. Colby L. Balkenbush, Esq. Brittany M. Llewellyn, Esq. 6385 South Rainbow Blvd., Suite 400 Las Vegas, Nevada 89118 <i>Attorneys for Defendants Unitedhealth Group,</i> <i>Inc., United Healthcare Insurance Company,</i> <i>United Health Care Services, Inc. dba</i> <i>Unitedhealthcare, UMR, Inc. dba United</i> <i>Medical Resources, Oxford Health Plans, Inc.,</i> <i>Sierra Health and Life Insurance Company,</i> <i>Inc., Sierra Health-Care Options, Inc., and</i> <i>Health Plan of Nevada, Inc.</i>

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: February 3, 2020

